

RECEIVED
US EPA, DALLAS, TX
ASSOCIATE DIRECTOR



Nathan Block

Senior Counsel, Litigation & Disputes
BP Legal

17 FEB 24 AM 1:39

COMPLIANCE ASSURANCE
& ENFORCEMENT DIV

BP America Inc
501 Westlake Park Boulevard
Houston, Texas 77079
Direct +1-832-619-4789
Fax 281-366-7578
Nathan.Block@bp.com

February 13, 2017

Mr. Kenneth Talton, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

Re: SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana; CERCLIS #: LAD008434185; Information Request Pursuant to CERCLA Section 104(e), 42 U.S.C. Section 9604 & Information Request

Dear Mr. Talton:

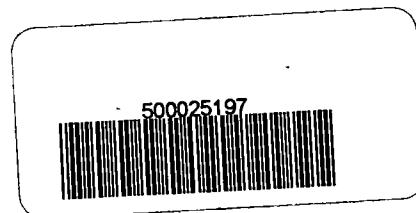
This letter constitutes the response to the U.S. Environmental Protection Agency's ("USEPA") January 11, 2017, CERCLA Section 104 Information Request (the "Request") regarding the SBA Shipyard Superfund Site, Jennings, Jefferson Davis Parish, Louisiana. This response is submitted by Atlantic Richfield. USEPA is seeking information regarding the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site by Atlantic Richfield.

Atlantic Richfield received the Information Request on January 17. Atlantic Richfield initiated a diligent search of our existing files but was unable to locate any responsive documents related to the SBA Shipyard Superfund Site.

We thank you for your cooperation and patience and welcome any questions you may have on this matter. If new information is discovered, Atlantic Richfield will supplement its response.

Sincerely,

Nathan Block
Senior Counsel, Litigation & Disputes
BP Legal



GENERAL OBJECTIONS

The Atlantic Richfield Company's (ARC) Response to this Information Request Pursuant to CERCLA Section 104(e) (the Request) is subject to the following general objections (General Objections):

- A. Nothing in ARC's response to this Request shall constitute an admission of liability for the activities, ownership, or operation of the facility located at 9040 Castex Landing Road, Jennings, Jefferson Davis Parish, Louisiana 70546 (the "Site"). By responding to this Request, ARC does not intend to waive any applicable privileges, including but not limited to the attorney-client and the attorney work product privilege.

- B. ARC objects to the Request as overbroad and unduly burdensome to the extent it seeks to impose an obligation to search and obtain information from any source of information that may be available, including sources in the public domain (such as public libraries, public document repositories and the files of any branch of the federal, state or local government) as well as other sources that are not in ARC's possession, custody or control

GENERAL INFORMATION CONCERNING RESPONDENT

1. Provide the full legal name and mailing address of the Respondent.

Atlantic Richfield Company
501 Westlake Park Blvd.
Houston, TX 77079

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Respondent, and each person(s) that was relied on or consulted with in the preparation of the answer.

Doris J Daniels
Land & Legal Support Project Manager
Remediation Management
3901 East Plano Pkwy
Plano, TX 75074
Ph 972-509-7007

Felton Campbell
Associate Project Manager
Remediation Management
3901 East Plano Pkwy
Plano, TX 75074
Ph 972-509-7020

Nathan Block
Senior Counsel, Litigation
501 Westlake Park Drive
Houston, Texas 77079
Ph: 832-619-4789

Sherry Morris
Senior Paralegal
501 Westlake Park Drive
Houston, Texas 77079
Ph: 832-619-4871

3. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices; please provide the individual's name, address, and telephone number

Atlantic Richfield Company
Attn. Nathan Block
501 Westlake Park Blvd
WL1 – LR3 – 3 668B
Houston, TX 77079

4. If Respondent is a business, please give a brief description of the nature of the business.

The Atlantic Richfield Company and its predecessor companies has changed over time. Among other things, Atlantic Richfield and its predecessors used to conduct oil & gas exploration and production; oil refining and marketing, transportation of hydrocarbons in ships, pipelines and trucks, manufacturing and marketing of chemicals; coal mining; mining and processing of copper, zinc and other metals and ore, and manufacturing wire and other metal products. Atlantic Richfield has also owned an interest in a cogeneration facility and insurance companies, and operated an environmental remediation management business.

Today ARC's business focuses on the management of its retained assets and liabilities arising from the above operations

REQUESTS FOR DOCUMENTS

Please identify (see Definitions) and provide copies of all documents (see Definitions) consulted, examined, or referred to in the preparation of the answers to the above questions including all subparts of each question, or that contain information responsive to the question

Section 1

- 1 Have you or any associated and/or related entities in any way been involved with or conducted business with the Site?
 - a. If so, please describe your involvement with the Site
 - b. Provide copies of documents related to any involvement with the Site.

ARC incorporates the general objections stated above. Without waiving those objections, and after diligent inquiry ARC has not identified any information regarding involvement at the site.

Searches of records and databases were conducted using the terms and information provided in Request. Additionally, ARC contacted Mr. Kenneth Talton, Enforcement Officer to inquire whether or not EPA had any additional information regarding the basis for its inquiry to ARC which might help in focusing search efforts. No additional information was available. As a result, ARC responds that it has not identified or located any documents relevant to this site.

If documents are later identified or become available, ARC will supplement its response.

- 2 If your answer to question 1 above is "No", you do not need to respond to the remaining questions.

Section 2

3. Please identify any dealings or transactions you and/or any associated entities have or had with SBA Shipyards, Inc , Louis Smalhall, Suzanne Smalhall, LEEVAC Shipyards, Inc , n/k/a Bunge Street Properties, LLC, and LEEVAC Industries, LLC n/k/a LEEVAC Shipyards Jennings, LLC. Please provide a brief description of the nature of those dealings or transactions and the timeframes during which those dealings and transactions occurred
 - a. Specifically, provide date(s) that your barge(s) were sent to and/or removed from the Site, the type of product and/or material your barges brought to the Site, the name and contact information of the person who made such arrangements
4. Please provide any and all documents in your possession that are related to the dealings and transactions detailed in Question 3 above
5. Please include a detailed listing of cargo materials from transactions described in Question 3 the materials data safety sheet, dates of transaction, and any quantity associated with those materials.
6. Identify all of the individuals who currently have and those who have had responsibility for the Respondent's environmental matters (e g., responsibility for the disposal, treatment, storage, recycling, or sale of the Respondent's wastes). This information shall include, but not be limited to, the following:
 - a. Each individual's job title and duties (including the dates performing those duties),
 - b. The supervisors for such duties,
 - c. The current position or the date of the individual's resignation,
 - d. The nature of the information possessed by such individuals concerning the Respondent's waste management, and
 - e. The contact information of the individual.
7. Does the Respondent's company or business have a permit(s) issued under RCRA? If so, provide a copy(ies) of the permit(s).

8. Provide all RCRA Identification Numbers issued to Respondent by EPA or a state for Respondent's operations
9. Does the Respondent's company or business have, or has it ever had, a permit(s) under the hazardous waste laws of the State? If so, provide a copy(ies) of the permit(s)
10. Does the Respondent's company or business have an EPA Identification Number, or an identification number supplied by the State? If so, supply any such identification number(s)
11. Identify all federal, state, and local offices and agencies to which the Respondent has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.
12. Provide copies of all documents created or kept by the Respondent related to the nature, quantity, or source of the materials taken to the Site
13. If barges were placed or disposed at the Site, provide the following information
 - a. Where they were placed or disposed, and
 - b. Their condition when placed or disposed
14. Identify other individuals and entities that the Respondent has reason to believe may have taken or sent materials to the Site. Of these individuals and entities, specify which were observed by the Respondent at the Site and indicate when those observations were made. Provide all of the information known by the Respondent regarding the customers of these entities or individuals.